



# Exemption Request

## Paint Stripping and Miscellaneous Surface Coating Operations

Area Source Rule

40 CFR Part 63 Subpart HHHHHH

An owner of operator may request an exemption from the federal paint stripping and miscellaneous surface coating operation standards. In the request, it must be demonstrated that the spray-applied coatings used at the facility do not contain target hazardous air pollutants (HAP) and that methylene chloride (MeCl) is not used for coating removal.

**This is an exemption request from a specific federal rule, 40 CFR Part 63 Subpart HHHHHH. Regardless of exemptions, an operation may still be subject to additional rules or permitting. Please review the list of activities and sources in [OAR 340-216-8010 Table 1](#) and contact DEQ with any questions.**

Target HAPs are compounds of chromium, lead, manganese, nickel, or cadmium. Coatings are determined to contain target HAPs if the concentration of any individual target HAP is greater than the following thresholds:

- For cadmium, chromium, lead and nickel, 0.1% or more by mass.
- For manganese, 1.0% or more by mass.

If you only spray-apply coatings using hand-held aerosol cans and/or spray guns with a cup capacity of 3 fluid ounces or less, you are exempt from the federal standards, but are still required to submit an exemption request form. Information regarding the concentrations of these metals is shown in the Material Safety Data Sheet for the coating.

An exemption from the requirements of Subpart HHHHHH is case/fact specific. To request an exemption you must provide information about your operation to show why an exemption for your business should be granted. We will respond to your request after an evaluation of the information provided has been completed.

### 1. General Information:

Type of Operation: Surface Coater \_\_\_\_\_ Autobody \_\_\_\_\_

Start-up Date for Spray Coating Operations: \_\_\_\_\_

Business/Facility Name: \_\_\_\_\_

Physical Address: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Telephone Number: \_\_\_\_\_ Email: \_\_\_\_\_

### Location where compliance records are maintained (*keep on site unless you are a mobile operation*):

Street Address: \_\_\_\_\_ County: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

### 2. Describe your surface coating operation and explain why your facility qualifies for the exemption. (Check all that apply):

- Do you perform paint-stripping activities using Methylene Chloride? Yes \_\_\_\_\_ No \_\_\_\_\_
- Do you spray or apply coatings with any of the target HAPs? (Chromium, Lead, Manganese, Nickel, Cadmium) Yes \_\_\_\_\_ No \_\_\_\_\_
- How many vehicles do you paint per year? \_\_\_\_\_
- How many gallons of coating do you use per year? \_\_\_\_\_
- How many gallons of Methylene Chloride containing paint stripper do you use per year? \_\_\_\_\_



**4. Certification Statement**

*I have checked with reliable sources and documents such as material safety data sheets and information obtained from coating suppliers and/or manufacturers of the coatings used at this facility. I have determined that we do not spray apply any of the target HAP containing coatings as defined in 40 CFR 63.11180. If circumstances change and we do intend to spray apply target HAP containing coatings at our facility, we will submit the initial notification required by 40 CFR 63.11175 (unless previously submitted), and will comply with the requirements of 40 CFR part 63 subpart HHHHHH (National Emission Standard for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources). I understand that the spray application of any target HAP containing coatings at my facility voids any exemption that might be granted as a result of this petition and immediate compliance will be required, to include a permit. I also understand that DEQ has the right to perform an unannounced inspection on my property to verify all of the information submitted on this form.*

**I am aware that there are significant penalties for submitting false information, including the possibility of a fine and imprisonment for knowing violations. I certify under penalty of law, to the truth, accuracy, and completeness of the information provided in this petition.**

\_\_\_\_\_  
**Signature of Certifying Official** (signature is required)

\_\_\_\_\_  
**Date**

**Certifying official must be owner or operator of the facility.**  
Check one/both that apply:    Owner     Operator

\_\_\_\_\_  
**Printed Name of Certifying Official**

*\*You must keep a record of the subsequent exemption approval letter, if granted, on-site at your facility.*

**Please complete this form, print, sign and mail/email it along with all required documentation to:**

Oregon Dept. of Environmental Quality  
Attn: Business Assistance Coordinator, Air Quality Division  
700 NE Multnomah St., Suite 600  
Portland, OR 97232-4100  
Email: [BAP@deq.state.or.us](mailto:BAP@deq.state.or.us)